

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	1:14-cv-05617
)	Judge Joan B. Gottschall
Plaintiff,)	
)	
v.)	
)	APPLICATION TO UNSEAL
ENAAM MAHMOUD ARNAOUT,)	MARCH 19, 2019 ORDER
)	
Defendant.)	
)	

Plaintiff, the United States of America, through undersigned counsel, hereby moves this Court for an order unsealing its March 19, 2019 Order, ECF No. 100, and in support of this motion states as follows:

1. On March 19, 2019, the Court entered an Order under seal. ECF No. 100. The parties jointly moved to file the Judgment, as well as the Joint Motion for Consent Judgment, under seal on March 8, 2019. ECF No. 93. The parties further requested that the Judgment be filed under seal “until the effective date of its Judgment.” *Id.*
2. The effective date of the Judgment has passed. *See* ECF No. 100.
3. Moreover, the purposes the parties provided for sealing are no longer served by maintain a seal on the Judgment. In their motion to seal, the parties stated that sealing was warranted because the Joint Motion contained information related to jurisdiction and an agreed upon final date for the disposition of this matter. ECF No. 93.
4. Plaintiff’s request to unseal does not apply to the Joint Motion and the reasons the parties provided for sealing do not apply to the Judgment. Any discussion in the Judgment regarding jurisdiction and an effective date are limited to the Court’s findings necessary to the execution of its Order.

5. Plaintiff cannot fully enact the Judgment while it remains under seal.

Accordingly, the United States requests this Court to issue an order unsealing the March 19, 2019 Order, for the purpose of allowing the parties to give the Order full effect.

DATED: January 14, 2020

Respectfully Submitted,

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Assistant Attorney General
Civil Division

WILLIAM C. PEACHEY
Director, District Court Section
Office of Immigration Litigation

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/s/ Anthony D. Bianco
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CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2020, I filed the foregoing document and any exhibits and attachments thereto, together with a proposed order, with the Clerk of the Court through the Court's ECF system. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically filed Notices of Electronic Filing.

DATED: January 14, 2020.

/s/ Anthony D. Bianco
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